

EXHIBIT C

~~Martin Tripp-Confidential~~

09:02 1 witness.

09:02 2 THE CERTIFIED REPORTER: Sir, would you
09:02 3 raise your right hand, please.

09:02 4 You solemnly swear the testimony you're
09:02 5 about to give in the matter now pending shall be the
09:02 6 truth, the whole truth, and nothing but the truth
09:02 7 so help you God?

09:02 8 THE WITNESS: I do.

09:02 9 THE CERTIFIED REPORTER: Thank you.

09:02 10 MR. FISCHBACH: Sean, before we get
09:02 11 started, just a minor housekeeping note.

09:02 12 Mr. Tripp has a -- a -- has a back
09:02 13 injury, so just please understand we might need to
09:02 14 break from time to time for him to stand up and
09:02 15 walk around and things like that, so...

09:02 16 MR. GATES: Sure, that's no problem.

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18 MARTIN TRIPP,
19 called as a witness herein, first duly sworn by the
20 reporter, was examined and testified as follows:

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22 EXAMINATION

23 BY MR. GATES:

24 Q. Along those lines, Mr. Tripp, are you
25 taking any medications that would prevent you from

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09:48 1 Q. Which year?

09:48 2 A. 2015.

09:48 3 Q. So you were married in 2015.

09:48 4 A. Yes, so four years.

09:48 5 Q. When you were sharing information with
09:48 6 Linette Lopez, information that you had obtained
09:48 7 from Tesla, did -- did your wife know about that?

09:48 8 A. She did not.

09:48 9 Q. Did you tell her that "I might lose my
09:49 10 job"?

09:49 11 MR. FISCHBACH: I'm going to object on the
09:49 12 basis of marital privilege and instruct the witness
09:49 13 not to answer.

09:49 14 MR. GATES: And we're going to play this
09:49 15 little game probably throughout, which is he
09:49 16 instructs you not to answer. I ask you "Are you
09:49 17 going to follow your attorney's instruction?" So
09:49 18 you have to decide whether or not to follow his
09:49 19 instruction.

09:49 20 Q. So I'm going to ask you are you going to
09:49 21 follow your attorney's instruction?

09:49 22 A. Yes, I am.

09:49 23 Q. When you were sharing information with
09:49 24 Linette Lopez, information that you had taken from
09:49 25 Tesla, how did you think it was all going to end?

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09:49 1 What did you think was going to be accomplished?

09:49 2 A. I was hoping that it would cause Tesla to
09:49 3 change it's ways and improve things. That's what I
09:50 4 was hoping for.

09:50 5 Q. Did you think that even if Tesla changed its
09:50 6 ways, it might have been upset that somebody had
09:50 7 taken its information and shared it with a reporter?

09:50 8 MR. FISCHBACH: Objection; foundation.

09:50 9 Answer if you can.

09:50 10 THE WITNESS: That was a possibility, but
09:50 11 based on the issues that I saw, I was more concerned
09:50 12 to get the information out than the repercussions
09:50 13 from that.

09:50 14 Q. BY MR. GATES: Did you think in the end you
09:50 15 were going to be seen as a hero?

09:50 16 A. I did not think of it that way at all.

09:50 17 Q. You didn't.

09:50 18 What did you think was going to happen
09:50 19 with your job?

09:50 20 A. I didn't think that far ahead; I was not
09:50 21 worried. I was more concerned about public safety.

09:51 22 Q. Do you think you should be viewed as a hero
09:51 23 for disclosing Tesla's confidential information to
09:51 24 a reporter?

09:51 25 A. No.

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09:51 1 Q. How should you be viewed then?

09:51 2 A. Preferably not viewed at all.

09:51 3 Q. All right. You wanted to remain anonymous.

09:51 4 A. That is correct.

09:51 5 Q. You wanted to continue with your job at
09:51 6 Tesla while continuing to provide information to
09:51 7 reporters.

09:51 8 A. Only if it was necessary.

09:51 9 Q. And you were going to do that for as long
09:51 10 as you thought it was necessary.

09:51 11 A. Yes.

09:51 12 Q. As determined by you.

09:51 13 A. Yes.

09:51 14 Q. So you thought by changing -- by -- excuse
09:51 15 me. Let me start that again.

09:51 16 You thought by sharing information with
09:51 17 Linette Lopez, you would change the -- what was
09:52 18 being done at the Tesla Gigafactory; right?

09:52 19 A. That was my hope.

09:52 20 Q. And you were going to continue to provide
09:52 21 information from Tesla to Linette Lopez as long as
09:52 22 it was -- you thought there were things that needed
09:52 23 to be changed at Tesla's Gigafactory.

09:52 24 A. If it involved public safety, yes.

09:52 25 Q. So a lot of the information that you

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17:53 1 A. It tells me that it made it out of the
17:53 2 Gigafactory.

17:53 3 Q. Okay. Does it tell you one way or another
17:53 4 whether anything made it into a VIN?

17:53 5 A. Not in this instance, it is not.

17:53 6 MR. GATES: Okay. No further questions.

17:53 7 MR. FISCHBACH: Read and sign.

17:53 8 VIDEO TECHNICIAN: This is the conclusion
17:53 9 of the --

17:53 10 MR. GATES: Hold on; I've got to designate
17:53 11 it as confidential.

17:53 12 Designate the transcript a
17:54 13 confidential.

17:54 14 VIDEO TECHNICIAN: All right. This is the
17:54 15 conclusion of the deposition of Martin Tripp; the
17:54 16 time is approximately 5:53. We're going off the
17:54 17 record; end of media file number five.

18 MR. GATES: All right. Thank you.

19 (The deposition concluded at 5:53 p.m.)

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